

EXHIBIT “D”

From: Mike Trauben
Sent: Monday, January 8, 2024 12:24 PM
To: google-legal-support@google.com
Cc: Michael Jon Samuels; Thomas Richards (trichards@singhtraubenlaw.com); Justin Trauben (jtrauben@singhtraubenlaw.com)
Subject: RE: Vastago Producciones, LLC v. Heaven Publishing LLC and Michael Rodriguez (Internal Ref. No. 47263891)
Attachments: [23-11-09] Subpoena to Produce Documents [YouTube - Google LLC].pdf; [23-11-27] Google's Objections to Document Subopena.pdf
Importance: High

Dear Google,

Unfortunately, having received no meaningful response or any responsive documents to the attached validly issued and served Subpoena (which Subpoena all parties to this action consented to), and with Google having not appeared at the meet and confer teleconference that was set, we are seemingly being forced to move forward with filing a motion to compel. To that end, while we prepare this motion to compel for filing, please let us know if Google will reconsider and simply provide the requested documents and information the parties are requesting pursuant to this valid and narrowly tailored Subpoena.

Sincerely,
Mike Trauben

[Attorney Bio](#) | [Email](#) | [vCard](#)



From: Michael Jon Samuels <MSamuels@singhtraubenlaw.com>
Sent: Friday, December 1, 2023 11:46 AM
To: google-legal-support@google.com
Cc: Justin Trauben <jtrauben@singhtraubenlaw.com>; Noemi Hernandez <NHernandez@singhtraubenlaw.com>; Mike Trauben <mtrauben@singhtraubenlaw.com>
Subject: Re: Vastago Producciones, LLC v. Heaven Publishing LLC and Michael Rodriguez (Internal Ref. No. 47263891)

Hello again,

By way of update, the automated voice on the conference line just announced the following and then ended the connection:

"You are not allowed to join this call. Goodbye."

We remain available to Google to meet and confer and look forward to hearing from you as to when and how.

Thank you,

Michael

[Attorney Bio](#) | [Email](#) | [vCard](#)



From: Michael Jon Samuels <MSamuels@singhtraubenlaw.com>

Date: Friday, December 1, 2023 at 11:36 AM

To: "google-legal-support@google.com" <google-legal-support@google.com>

Cc: Justin Trauben <jtrauben@singhtraubenlaw.com>, Noemi Hernandez <NHernandez@singhtraubenlaw.com>, Mike Trauben <mtrauben@singhtraubenlaw.com>

Subject: Re: Vástago Producciones, LLC v. Heaven Publishing LLC and Michael Rodriguez (Internal Ref. No. 47263891)

Hello,

We are on the below conference line and waiting to be allowed in by the host. Please advise if there has been a schedule change or if there is a further action we should take to enter the conference.

Thank you,

Michael

[Attorney Bio](#) | [Email](#) | [vCard](#)



From: "google-legal-support@google.com" <google-legal-support@google.com>

Date: Tuesday, November 28, 2023 at 9:39 AM

To: Mike Trauben <mtrauben@singhtraubenlaw.com>

Cc: Michael Jon Samuels <MSamuels@singhtraubenlaw.com>, Justin Trauben <jtrauben@singhtraubenlaw.com>, Noemi Hernandez <NHernandez@singhtraubenlaw.com>
Subject: RE: Vástago Producciones, LLC v. Heaven Publishing LLC and Michael Rodriguez (Internal Ref. No. 47263891)

Hello,

Thank you for your email. It looks like **11:30am PST on Friday, December 1** works. Please use the below dial-in information to connect to the call at that time:

Dial: (US) +1 253-289-5692
PIN: 807 975 456 04#

Regards,
Google Legal Investigations Support

On Mon, Nov 27, 2023 at 20:25 UTC mtrauben@singhtraubenlaw.com wrote:

Hi,

Thank you very much for the response to the Subpoena issued in the above-referenced matter. As a meet and confer call could certainly help streamline the process and likely assuage any perceived concerns regarding the Subpoena, is there perhaps a convenient time to discuss this matter on Thursday, November 30 or, alternatively, anytime on Friday, December 1, between 11:00 a.m. PST and 1:30 p.m. PST?

Thank you again,

Mike Trauben

[Attorney Bio](#) | [Email](#) | [vCard](#)

Error! Filename not specified.

From: google-legal-support@google.com <google-legal-support@google.com>
Sent: Monday, November 27, 2023 10:50 AM
To: Mike Trauben <mtrauben@singhtraubenlaw.com>
Subject: Re: Vástago Producciones, LLC v. Heaven Publishing LLC and Michael Rodriguez (Internal Ref. No. 47263891)

Hello Michael,

Please see the attached letter regarding the above-captioned matter. If you would like to set up a phone call with our team to meet and confer regarding this matter, please let us know in a reply to this email.

Regards,
Google Legal Investigations Support

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